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In Reply Refer To:  
C0468

January 21, 2013

**VIA EMAIL**

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**Re: Church of Scientology's Response Re: Lawrence Wright**

Dear David:

As you know, this firm represents the Church of Scientology International and we write regarding CNN's upcoming story on the allegations contained in Lawrence Wright's book *Going Clear: Scientology, Hollywood, and the Prison of Belief*. This morning CNN's Miguel Marquez presented the following false and defamatory allegations to the Church for comment:

Paul Haggis claims in his researching of the church he found evidence of children made to work long hours. How does the church respond to that claim?

In the book it is claimed that a file was maintained on John Travolta and that he was threatened with being outed as gay by the church. Additionally, on page 169 of the book David Miscavige is quoted as saying "The guy is a Faggot. We're going to out him" when referring to John Travolta. How does the church respond to claims that Travolta was threatened with being outed?

CNN spoke to a former Scientologist, and Sea Org member, who claims they witnessed verbal and physical abuse by Mr. Miscavige.

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Mr. Wright's book also claims several incidents of abuse by Mr. Miscavige. The former Scientologist CNN spoke to also alleges they were declared a suppressive person and sent to the Gold Base in Hemet CA for punishment. Specifically, that they were forced to wear all black in searing heat, perform hard labor outdoors and take part in a "rehabilitation program" to "confront their treasonous actions against Scientology." How does the church respond to the many claims of abuse attributed to Mr. Miscavige? Does a such a rehabilitation program at the church's Gold Base exist? Are church members punished in any way at this other other facilities?

Finally Mr Wright and his publishing company Random House claims they have been threatened with legal action over the publishing of this book. Has the church filed or begun the process of suing Mr Wright and/or Random House? If so on what grounds and what damages is the church seeking?

The claims that the Church used immoral and illegal child labor, threatened to expose alleged private facts about John Travolta, and that the Church and its ecclesiastical leader David Miscavige perpetrated acts of violence constitute defamation *per se* because they accuse the Church and Mr. Miscavige of committing crimes and other unsavory behavior that would injure their professional reputations. Cal. Civ. Code § 45; *see Leonardini v. Shell Oil Co.*, 216 Cal. App. 3d 547, 572 (1989). Not only would the public's perception of the Church and Mr. Miscavige be tainted, but the Church's members would be extremely upset (and rightfully so) if such accusations were true (which they are not) as they would call into question whether their Church abused children and their clergy and whether their own privacy has been or will be compromised by the Church.

Regarding the claim that the Church made children work long hours, the Church diligently followed, and continues to follow, all child labor laws in every state or country in which it operates. It is our understanding that Mr. Haggis' "research" involved reading an anti-Scientology website where a small group of ex-Scientologists who attended Scientology boarding schools as children claim they were forced to perform chores for long hours. Although those students had to perform tasks not unlike those performed by children in other boarding schools or Israeli Kibbutzim, such as tending to the gardens and looking after the fruit orchards, their chores never amounted to "child labor." The claim that these children were forced to work long hours to the detriment of their schooling, extracurricular activities (including sports, music, and drama), time to visit with their parents, appropriate rest, and time to goof around and be kids is unfounded and contradicted by the large majority of now-grown children who attended the schools. (The

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Church changed its policy regarding permitting members of the Sea Organization to rear children while serving in the religious order and no longer operates such schools.)

Regarding the claim about John Travolta, the Church would never disclose a parishioner's private information, let alone threaten him with exposure. Indeed, the Church has made considerable efforts, to its own legal detriment, protecting the privacy of its members. The allegation comes from an anti-Scientologist who remains bitter following his removal in 1982. While we do not represent Mr. Travolta and are therefore not in the position to address the claims against him, the Church adamantly denies that it has, or would, ever disclose or threaten to disclose a member's private information.

Regarding the claims about violence against Mr. Miscavige, three years ago I met with Richard Davis, Richard Griffiths and you about these same tired allegations from apostate sources when Anderson Cooper aired these unsubstantiated and false claims. CNN put on air wives of four of the apostate sources who refuted all the colorful allegations of their ex-husbands. The apostate sources included admitted liars and perjurers who have banded together to form Marty Rathbun's "posse" in order to, in their own words, destroy the Church. In addition to the statements of the wives, the Church presented CNN with numerous legal letters, affidavits and videos that proved the allegations are false. No new claims or supporting evidence about violence have emerged since CNN ran its "investigative report" three years ago—the allegations remain unsupported—and inclusion in Mr. Wright's book, with no other evidence apart from the "posse" members' self-corroboration, does not make them more believable.

Based on our conversation with CNN, we believe the new claim comes from Karen Schless Pressley. She left the Church in 1998, 12 years before CNN aired its previous program. Her story is equally ludicrous to those of her fellow apostates and, if the "details" are similar to what she placed on an Anonymous website, they are refuted by the "victim" who says the incident never occurred.

Regarding the claims about the Rehabilitation Work Force, it is a completely *voluntary* program of spiritual rehabilitation and the claims of abuse while participating in the program are false. Indeed, we understand Karen Schless Pressley is CNN's source for the alleged abuse endured while in the RPF. We attach Ms. Schless Pressley's RPF waiver demonstrating that her time in the RPF was completely voluntary. She could have left whenever she wanted to—as all members who participate in the RPF may do—but she *chose* to stay.

In brief, the Rehabilitation Project Force (RPF) is a religious program available only to a very small number of members of the Church of Scientology. Neither staff members who work in local Churches of Scientology around the world nor the Church's parishioners qualify for this program. Only those who belong to the religious order of the

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Church of Scientology, the Sea Organization, may do the RPF, and then only for specific reasons, and then *only of their own volition*.

Sea Organization members share a common commitment to serve their religion at all times and to exemplify Scientology ethics by living up to enhanced ecclesiastical standards applicable only to the Sea Org. The purpose of the RPF is to provide a "second chance" to those who have failed to fulfill their ecclesiastical responsibilities as members of the Sea Organization and want to go through a program to improve. In such a situation, the individual is given the choice of either leaving the Sea Organization or participating in a religious program designed to provide the individual with an opportunity to progress spiritually and remedy past shortcomings—the RPF religious program. In addition to engaging in religious study and religious counseling on a daily basis, individuals on the RPF work eight hours each day as a team on assigned tasks.

The program is based upon one of the oldest and most fundamental concepts in religion—a religious retreat in the form of a cloister focusing on intensive spiritual introspection and study, balanced by some form of physical labor. This practice is common to the religious orders of many other world religions in addition to Scientology, including Buddhism, Hinduism, Jainism and the monastic orders of the Roman Catholic Church.

Finally, regarding the question of whether the Church threatened to sue Mr. Wright and Random House about false and defamatory allegations in *Going Clear*, the Church communicated in several letters that it is evaluating its legal rights and the statute of limitations has only just started running. Publishers in the U.K. and Canada declined to publish the book because of legal reasons. Although libel law is more plaintiff-friendly in the U.K. and Canada, the essence of libel law in those legal systems and America are the same: false and defamatory statements are actionable. That America has a different burden of proof and treats public figures differently from private figures make prosecuting a claim for defamation more difficult in the United States. But Mr. Wright cannot escape the fact that his U.K. and Canadian publishers, regardless of burdens of proof and differences between public and private figures, clearly found many statements in the book false and defamatory.

We remind CNN that one who repeats or otherwise republishes a slander is subject to liability as if he had originally said it. *See Khawar v. Globe Int'l*, 19 Cal. 4th 254 (1998); Rest.2d Torts, § 578. To prove a cause of action for slander, the plaintiff must show the defendant made a false and unprivileged oral communication attributing to the plaintiff specific misdeeds or certain unfavorable characteristics or qualities. Cal. Civ. Code, § 46; Rest.2d Torts, § 568, subd. (2). CNN should be mindful that courts will pay careful attention to the powerful visual nature of television reports that seek to disguise their intended defamatory implications through skillful

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editing and presentation. As stated in *White v. Fraternal Order of Police*, 909 F.2d 512, 526 (D.C. Cir. 1990):

[T]elevision news reporting is a different, more powerful genre than newsprint. With television, "[w]e must also take into account the impact of the visual effects as well as the text because 'the television medium offers the publisher the opportunity, through visual presentation, to emphasize certain segments in ways that cannot be ascertained from a mere reading of the transcript.'" (Citation.) . . . Television touches more senses than does the print media, and the standards for finding defamation cannot be woodenly applied without taking into account the kind of medium by which the message was delivered.

Mr. Wright's book is full of many mistakes, unfounded statements, and utterly false facts. It is infused with religious bigotry—we caution CNN against broadcasting his hateful and, in many cases, actionable statements.

Sincerely,

GLASSMAN, BROWNING, SALTSMAN & JACOBS, INC.

By: //s  
ANTHONY MICHAEL GLASSMAN

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